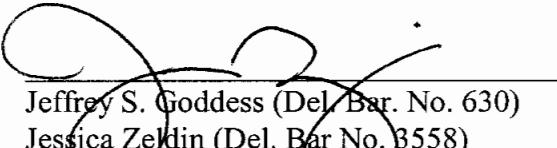


**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE: TRICOR DIRECT PURCHASER ANTITRUST LITIGATION)	Civil Action No. 05-340 KAJ
)	
)	
THIS DOCUMENT RELATES TO:)	Hon. Kent Jordan, U.S.D.J.
ALL CASES)	
C.A. No. 05-340 (Louisiana Wholesale))	
C.A. No. 05-351 (Rochester))	
C.A. No. 05-358 (Meijer, Inc., et al.))	
)	

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs Louisiana Wholesale Drug Co., Inc., Rochester Drug Co-Operative, Inc., Meijer, Inc. and Meijer Distribution, Inc. hereby move the Court, pursuant to Rules 23(a) and 23(b)(3) of the Federal Rules of Civil Procedure, for an Order permitting this action to be maintained as a class action proceeding pursuant to Rule 23(b)(3) of the Federal Rules of Civil Procedure. By this motion, Plaintiffs request the Court to certify the action as a class action on behalf of all persons or entities in the United States who purchased TriCor in any form directly from any of the Defendants at any time during the period April 9, 2002 to the present. Excluded from the Class are Defendants (and their officers, directors, management, employees, subsidiaries, and affiliates), and all federal government entities. The grounds for this motion are set forth in the Direct Purchaser Class Plaintiffs' Opening Brief In Support Of Their Motion For Class Certification, filed contemporaneously herewith.



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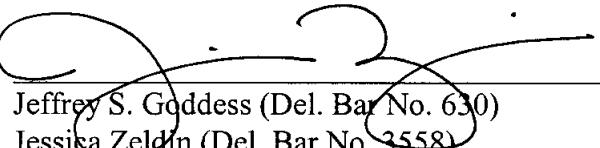
May 8, 2006

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)	

STATEMENT PURSUANT TO D. DEL. L.R. 7.1.1

Movants hereby certify that through counsel it has made reasonable efforts to reach agreement with counsel for defendants concerning the subject matter of this motion, without success.


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CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2006, I electronically filed PLAINTIFFS' MOTION FOR CLASS CERTIFICATION using CM/ECF, which will send notification of such filing to all registered participants, including:

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I hereby certify that on May 8, 2006 I sent by electronic mail the foregoing document to the following non-registered participants:

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